

9. Admitted; Defendant Mirzada notes, for clarification purposes, that the Law Firm Defendant is, on information and belief, one in the line of several business entities, or, as stated in the Policy, there are Predecessor Law Firms listed in the Malpractice Lawsuit.
10. Admitted.
11. Admitted; however, the facts and circumstances giving rise to the actions filed by Attorney Goodall include numerous other claims in addition to what is listed in this Paragraph.
12. Admitted; however, the facts and circumstances giving rise to the actions filed by Attorney Goodall include numerous other claims in addition to what is listed in this Paragraph.
13. Admitted.
14. Admitted.
15. The statements and actions of the Receiver averred in this Paragraph are admitted; Plaintiff's characterizations of the events are denied.
16. It is admitted the Farzayees filed for bankruptcy protection and that Attorney Goodall represented Mr. Mirzada and filed pleadings in the bankruptcy Court; Plaintiff's other characterizations and comments on the events are denied.
17. Admitted.
18. Admitted; by way of clarification, and most saliently, the Farzayees filed a plea in bar.
19. It is admitted that a hearing on the plea in bar, motion to dismiss, and motion to drop improper parties was held and written and oral arguments were presented.

20. Denied; the Court sustained the plea in bar holding that Mr. Mirzada's claims against the Farzayees and the Financial One claims against the Farzayees were time-barred. The Financial One action for dissolution continued unaffected. The order speaks for itself.
21. Denied; Mr. Mirzada's amended complaint speaks for itself; Mr. Mirzada's action avers, *inter alia*, that Attorney Goodall failed to bring all proper causes of action by Mr. Mirzada individually against the Farzayees individually, to include damages caused to Mr. Mirzada for the losses of the two business entities. Attorney Goodall, on information and belief, disagrees with Mr. Mirzada.
22. Admitted.
23. Admitted.
24. Admitted.
25. Admitted.
26. Admitted.
27. Admitted.
28. Admitted; however, the policy has a Retroactive Coverage Date extending back to 1998 and covers Predecessor Law Firms.
29. It is admitted the Policy contains such language, in addition to omitted language, in Section 1, Paragraph A. Coverage.
30. Admitted.
31. Denied. Mr. Mirzada has made no allegation of a "wrongful act" as defined in the Policy.
32. Denied.
33. Denied.

34. Denied.

35. Defendant Mirzada denies all averments not specifically admitted herein and denies any averment, actual or implied, in the unnumbered section titled: "Request for Relief."

WHEREFORE, the premises considered, Defendant Mirzada prays this Honorable Court TO DISMISS Plaintiff's Complaint for Declaratory Judgment, with prejudice, and for such other and additional relief as the Court may deem reasonable and just.

Dated: January 25, 2022.

Respectfully submitted,

Michael Mirzada,

By: /s/ Matthew Crist
Counsel

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, January 25, 2022, I caused a true copy of the foregoing paper to be filed in the Court's CM/ECF system to be served on all counsel of record.

By: /s/ Matthew Crist
Counsel for Defendant Mirzada